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Russell E. Jones, SBN 000549
D. Michael Mandig, SBN 005601
Attorneys for Trico Electric Cooperative, Inc.

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
KRISTIN K. MAYES
Commissioner
JEFF HATCH-MILLER
Commissioner
WILLIAM MUNDELL
Commissioner
MIKE GLEASON
Commissioner

Arizona Corporation Commission
DOCKETED
OCT 20 2004
DOCKETED BY

IN THE MATTER OF THE APPLICATION OF TRICO ELECTRIC COOPERATIVE, INC. FOR AN EXTENSION OF ITS CERTIFICATES OF CONVENIENCE AND NECESSITY IN AREAS OF PINAL COUNTY, ARIZONA

Docket No. E-1461A-04-0393

NOTICE OF FILING RESPONSES TO INSUFFICIENCY LETTER

COMES NOW the Applicant, TRICO ELECTRIC COOPERATIVE, INC., an Arizona nonprofit corporation ("Applicant" or "Trico"), which filed its Application for an Order Preliminary to the Issuance of an Extension to Existing Certificates of Convenience and Necessity on May 26, 2004, and on September 15, 2004, received an Insufficiency Letter from the Executive Consultant, Utilities Division of the Arizona Corporation Commission.

Notice is hereby given that the Applicant files herewith its responses to the Insufficiency Letter.

RESPECTFULLY SUBMITTED this 19th day of October, 2004.

WATERFALL ECONOMIDIS CALDWELL HANSHAW & VILLAMANA, P.C.

By _____
Russell E. Jones
D. Michael Mandig
Attorneys for Applicant, Trico Electric Cooperative, Inc., an Arizona nonprofit corporation

Original and 13 copies of the foregoing transmitted for filing this 19th day of October, 2004, with:

Docket Control
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

Carol Watson

ARIZONA CORPORATION COMMISSION
1200 W. Washington Street
Phoenix, Arizona 85007

RE: Trico Electric Cooperative, INC. – APPLICATION FOR AN EXTENSION OF ITS CERTIFICATE OF CONVENIENCE AND NECESSITY (DOCKET NO. E-01461A-04-0393) – **INSUFFICIENCY LETTER**

1. "Please provide a map of the requested service territory with an identification of the respective property owners requesting service."

   Exhibit A illustrates the requested service territory with an identification of the respective property owners requesting service in solid purple shading and labeled "Willow Springs South Village". The property owners requesting service are ANAM, Inc. an Arizona Corporation together with its developer The Remington Group an Arizona Corporation.

   "Please include the location of the Applicant's existing facilities and the proposed route on the proposed transmission line."

   Exhibit A includes the location of Trico's existing facilities labeled with black dashed lines and the proposed route on the proposed transmission line labeled with a red dashed line.

2. "Please identify all other electric providers with facilities in equal distance of the proposed extension area as the Applicant."

   Exhibit A identifies all other electric providers with facilities in equal distance of the proposed extension area as Trico.

3. "Please provide an estimate of cost of the electric transmission facilities required to extend service to the proposed extension area. The costs should include a description of the major components of the facilities."

   Exhibit B provides an estimate of cost of the electric transmission facilities required to extend service to the proposed extension area. The costs include a description of the major components of the facilities.

4. "Please provide a description of the method the Applicant will use to finance the transmission facilities required to extend service to the proposed extension area."

   The construction of the Willow Springs transmission facilities is recognized in the Trico Electric Cooperative, Inc.'s Long Range Plan. Upon approval of the Certificate of Convenience and Necessity, Trico will submit an amendment to Trico's Construction Work Plan, eligible for loan funds from Rural Utilities Services.

5. "Please provide an estimate of cost of the electric distribution facilities required to extend service within the proposed extension area. The costs should include a description of the major components of the facilities."

Exhibit C provides an estimate cost of the electric distribution facilities required to extend service within the proposed extension area. The costs include a description of the major components of the facilities. This estimate is to serve the first 3,560 residents, to be spread over a 5-10 year period.

"Please also provide a detailed one-line diagram of the proposed distribution facilities to be constructed by Trico."

Exhibit D provides a detailed one-line diagram of the proposed distribution facilities to be constructed by Trico.

6. "Please provide a description of the method the Applicant will use to finance the distribution facilities required to extend service to the proposed extension area."

The construction of the Willow Springs distribution facilities is recognized in the Trico Electric Cooperative, Inc.'s Long Range Plan. Upon approval of the Certificate of Convenience and Necessity, Trico will submit an amendment to Trico's Construction Work Plan, eligible for loan funds from Rural Utilities Services.

7. "Please provide a copy of all economic studies performed by the Applicant in conjunction with extending service to the proposed extension area."

Exhibit E is a copy of the original economic study performed by Trico in conjunction with extending service to the proposed extension area with the following growth projection scenarios:

Low Growth	11 year pay-back
Medium Growth	10 year pay-back
High Growth	9 year pay-back

8. "Please provide a description of the right of way process for the proposed transmission line. Please include a timeline, the estimated costs and method of finance."

Exhibits F provides a description of the right of way process for the proposed transmission line. Exhibit F includes a timeline, the estimated costs and method of finance.

9. "Please provide any other information which will allow the Commission to analyze and conclude that the Applicant has sufficient capacity or can develop

enough capacity to serve the existing and future demands of the proposed extension area."

Please be advised that there is no existing demand of the proposed extension area.

Exhibit G, submitted by Bruce Evans of Southwest Transmission, provides information which will allow the Commission to analyze and conclude that Trico has sufficient capacity or can develop enough capacity to serve the future demands of the proposed extension area.

10. "Please explain how Trico would ensure reliability of service with one radial 69 KV feed to serve the proposed extension area."

Exhibit H, explains how Trico can ensure reliability of service with one radial 69 kV feed to serve the proposed extension area.

ELECTRIC DISTRIBUTION PLAN - SERVICE AREAS FOR: Saddlebrooke Ranch / Willow Springs

SHEET NO.	
2	of 2

DATE DRAWN	BY
4/17/04	RAQ

REVISED	BY
5/28/04	RAQ
9/27/04	RAQ
10/12/04	RAQ

DEVPR:

PRJCT: Saddlebrooke Ranch / Willow Springs

WO NO:

TRICO ELECTRIC COOPERATIVE, INC.

A Touchstone Energy Cooperative
8600 W. TANGERINE RD. • MARANA, ARIZONA 85653
PHONE: (520)744-2944 • FAX: (520)682-6687

PINAL

T.	S.
R.	E.
S.	

MAP LOC:

APS

TRICO

Willow Springs South Village

Proposed Willow Springs Substation

Willow Springs Ranch Boundary

Saddlebrooke Ranch Boundary

69KV Line

PROPOSED 69KV ROUTE

Future SB Ranch Substation

Future Eagle Crest Substation

Existing Saddlebrooke Substation

Existing S.C.I.P. Distribution Line

Existing TRICO 3Ø-14.4/24.9KV Distribution

S.C.I.P. 69KV Substation

W.A.P.A. 115KV TRANSMISSION LINE

TRICO 69KV TRANSMISSION LINE

APS-500KV

APS-115KV (FRAMED-230KV)

APS-115KV

APS-230

WAPA-115KV

Legend

- TRICO Service Area
- APS Service Area
- Existing Saddlebrooke Area
- Existing Eaglecrest Area
- Existing Saddlebrooke Ranch Area
- Proposed TRICO Service Area
- Willow Springs Deeded Area
- Willow Springs Boundary
- Proposed Transmission lines
- Existing lines Others
- Existing TRICO lines
- Existing S.C.I.P. Distribution lines
- Existing Substation
- Proposed TRICO Substation

PINAL CO
PIMA CO

T 7S
T 8S
T 9S
T 10S

R 12E
R 13E
R 14E

EXHIBIT "A"

COST ESTIMATE

CUSTOMER: **WILLOW SPRINGS**

EXHIBIT "B"

W.O.: **33,808**

DATE: October 14, 2004 14:57:16

REMARKS: TRANSMISSION COST BASED ON CORONA 69 KV, 2003 COSTS PER MILE
ROUTE FROM SADDLEBROOKE RANCH DELIVERY POINT TO WILLOW SPRINGS SOUTH VILLAGE

COST FOR OVERHEAD 69 kV TRANSMISSION LINE APPROX 11.5 MILES

	CONSTRUCTION CONTRACT		11.5	MILES				*$1,415,075.00*
	SWCA WORK							*$40,000.00*
	STATE R/W LEASE							*$234,090.00*
	RW CLEARING							*$28,750.00*
	ENGINEERING							*$352,000.00*
					5 % OVERRUN			*$103,495.75*
	TOTAL COST TO BUILD OFFSITE TRANSMISSION LINE							*$2,173,410.75*

COST ESTIMATE

EXHIBIT "C"

W.O.: **33,808**

CUSTOMER: **WILLOW SPRINGS**

DATE: 14-Oct-04 14:57:16

REMARKS: SPINE IS 3 PHASE, 24.9 KV MAIN FEEDER TO SERVE TO THE BLOCK LINE
COST INCLUDE TRICO'S MAT'L AND LABOR FOR 500 MCM CONDUCTOR, CONDUIT AND VAULTS -MAT'L AND CONDUIT FUTURE MULTIPLE CIRCUIT. - VAULTS INSTALLED
ESTIMATED NUMBER OF LOT BASED ON WILLOW SPRINGS PRELIMINARY PLAT

DEVELOPERS CONDUIT AND VAULT MATERIAL COST FOR THREE PHASE 24.9 KV SPINE FACILITIES

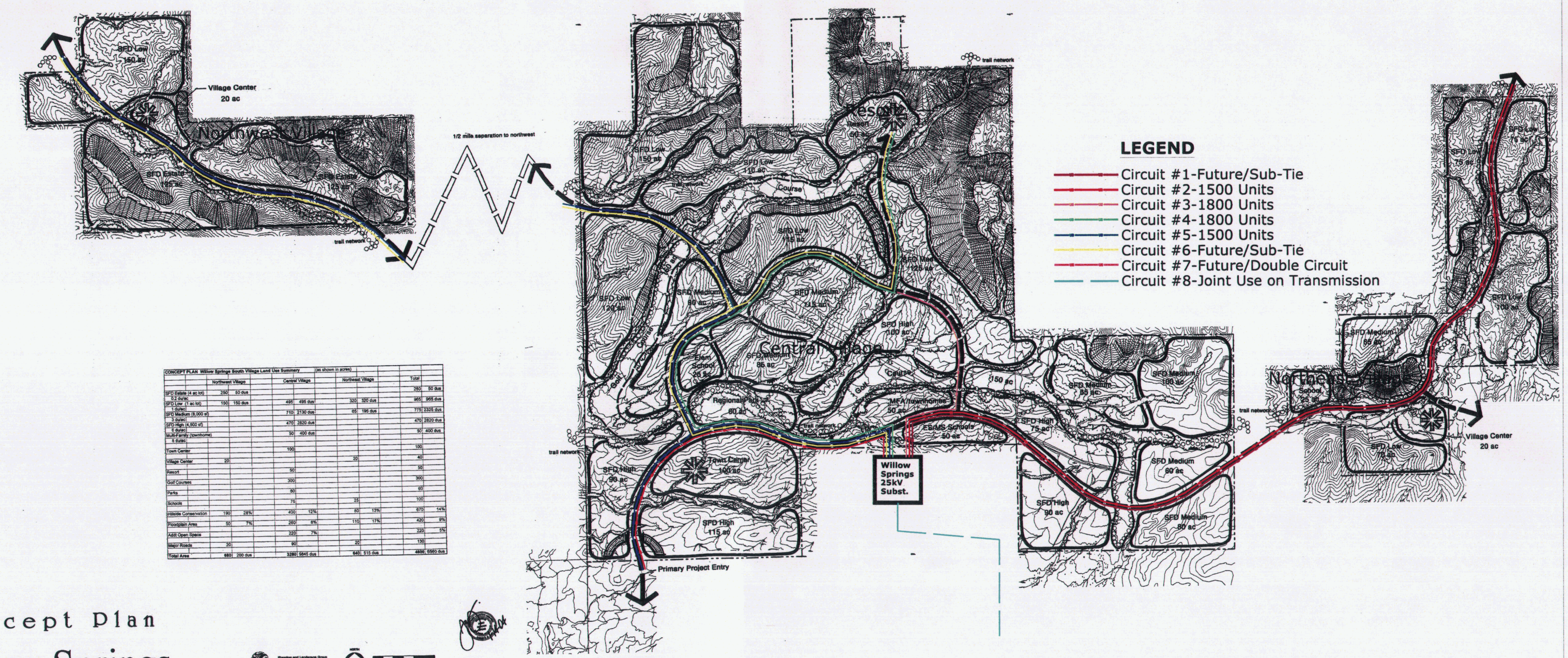
	NEW CONSTRUCTION MATERIALS			UNIT	MATERIAL	LABOR	LABOR & OH	TOTAL
QTY	UNIT NO.	DESCRIPTION		COST	COST	%	COST	COST
MATERIAL COST - CONDUIT/VAULTS	# OF CONDUITS		LINE FOOTAGE					
10500	21	LINE FOOTAGE-500'	500	$0.75	$7,875.00	0%	$0.00	$7,875.00
39600	12	LINE FOOTAGE-3300'	3300	$0.75	$29,700.00	0%	$0.00	$29,700.00
65700	9	LINE FOOTAGE-7300	7300	$0.75	$49,275.00	0%	$0.00	$49,275.00
75600	6	LINE FOOTAGE-12600	12600	$0.75	$56,700.00	0%	$0.00	$56,700.00
19800	3	LINE FOOTAGE-6600'	6600	$0.75	$14,850.00	0%	$0.00	$14,850.00
211200	SUB-TOTAL - CONDUIT COST WITHOUT LABOR				$158,400.00			
20	814-LA	VAULT+DELIVERY		$9,000.00	$180,000.00	0%	$0.00	$180,000.00
	TOTAL MATERIAL COST WITHOUT LABOR							$338,400.00

		UNDERGROUND FACILITIES(LESS TRENCHING COST AND LABOR)						*$338,400.00*
					CREDIT CONDUIT BACK TO DEVE			*($158,400.00)*
	SUB-TOTAL							*$180,000.00*
					5 % OVERRUN			*$9,000.00*
	COST FOR DEVELOPER FACILITIES (LESS CONDUIT COST & LABOR)							*$189,000.00*
			(ESTIMATE 3560 LOTS) DEVELOPERS SPINE COST PER LOT					*$53.09*
			TOTAL COST PER FOOT-NON TRICO	(30,300')				*$6.24*

TRICO'S COST FOR THREE PHASE UNDERGROUND 24.9 KV 500 MCM SPINE FACILITIES

CONDUCTOR AND EQUIP.									
25	PME	PADMOUNTED			$15,000.00	$375,000.00	20%	$75,000.00	$450,000.00
150	UM6-1(600A)	ELBOWS			$80.00	$12,000.00	20%	$2,400.00	$14,400.00
25	CONCRETE PA	PME BOXPAD			2000	$50,000.00	20%	$10,000.00	$60,000.00
50	UM48-2	3PH GROUND			$59.09	$2,954.50	20%	$590.90	$3,545.40
20	BRACKET ASS				$637.50	$12,750.00	20%	$2,550.00	$15,300.00
98436	(3)500MCM 345	PRI COND.	30300		$3.50	$344,526.00	20%	$68,905.20	$413,431.20

	$956,676.60
5 PERCENT OVERRUN	$47,833.83
CONDUIT COSTS	$158,400.00
TRICO'S UNDERGROUND MATERIAL AND LABOR	*$1,162,910.43*
TRICO COST PER FOOT FOR SPINE (30,300')	*$38.38*
(ESTIMATE 3560 LOTS) TRICO'S SPINE COST PER LOT	*$326.66*
TOTAL ESTIMATED SPINE COST	*$1,351,910.43*
TOTAL COST PER FOOT FOR SPINE (30,300')	*$44.62*
(ESTIMATE 3560 LOTS) TOTAL SPINE COST PER LOT	*$379.75*
TOTAL COST / MILE	*$235,580.43*
REFUNDABLE 10% DEPOSIT DUE	*$116,250.00*
REFUND $ 75/LOT WITH PAID APPLICATION FEE ON FIRST 1550 LOTS	*$116,250.00*



CONCEPT PLAN Willow Springs South Village Land Use Summary (as shown in acres)										
	Northwest Village			Central Village			Northeast Village			Total
SFD Estate (4 ac lot) 0.2 du/ac	250	50 dus								250 50 dus
SFD Low (1 ac lot) 1 du/ac	150	150 dus		495	495 dus		320	320 dus		965 965 dus
SFD Medium (8,000 sf) 3 du/ac				710	2130 dus		65	195 dus		775 2325 dus
SFD High (4,500 sf) 6 du/ac				470	2820 dus					470 2820 dus
Multi-Family (townhome) 8 du/ac				50	400 dus					50 400 dus
Town Center				100						100
Village Center	20						20			40
Resort				50						50
Golf Courses				300						300
Parks				60						60
Schools				75			25			100
Hillside Conservation	190	28%		400	12%		80	13%		670 14%
Floodplain Area	50	7%		260	8%		110	17%		420 9%
Addl Open Space				220	7%					220 5%
Major Roads	20			90			20			130
Total Area	680	200 dus		3280	6845 dus		640	515 dus		4600 6560 dus

Concept Plan

Willow Springs

EXHIBIT D

Willow Spring Financial Calculations Based on Low Growth

Cost of Services, Based on Test Year December 31, 2000

RECONCILIATION OF EXPENSES IN YEAR 2000 COST STUDY	31-Dec-00 Audit report	Total kWh 396,502,342
Total Electric Plant	$ 90,344,818	$/kWh
Total Sales of Electric Energy	$ 36,533,674	$0.09214
Other Electric Revenue	$ 727,276	$0.00183
Total Operating Revenue	**$ 37,260,950**	$0.09397
Revenue less cost of Power	**$15,080,861**	$0.03803
Power Production Expense	$ -	
Cost of Purchased Power	**$ 22,180,089**	$0.05594
Transmission Expense	$ 22,683	$0.00006
Distribution Expense - Operation	$ 2,983,874	$0.00753
Distribution Expense - Maintenance	$ 1,039,138	$0.00262
Consumer Accounts Expense	$ 1,348,993	$0.00340
Customer Service and Informational Expense	$ 195,134	$0.00049
Sales	$ 226,032	$0.00057
Administrative and General	$ 1,957,009	$0.00494
Total Operation and Maintenance Expense	**$ 29,952,952**	$0.07554
Total O & M less Cost of Power	**$ 7,772,863**	$0.01960
Depreciation and Amortization	$ 2,515,103	$0.00634
Tax Expense - Property and Gross Receipts	$ -	$0.00000
Property Tax less G. Receipts	$ 286	$0.00000
Tax Expense - Other		
Interest on Long Term Debt	$ 2,370,185	$0.00598
Interest Charged to Construction Credit		
Interest Expense - Other	$ 48,600	$0.00012
Other Deductions	$ 71,439	$0.00018
Total Cost of Electric Service	**$ 34,958,565**	$0.08817
Cost of Service less Cost of Power	**$12,778,476**	$0.03223
Operating Margins	$ 2,302,385	$0.00581
Non Operating Margins - Interest	$ 156,376	$0.00039
Other Capital Credits	$ 88,808	$0.00022
Net Margins	$ 2,547,569	$0.00643

Date	Year	New Customers per Year	Total Customers	4.5 kW per home Load, kW W/ Load Factor 65%	Revenue less cost of Power plus 5% $0.03994 per kWh Revenue	$2,136 per customer Distribution Investment	Substation and Transmission Investment	Total O & M less Cost of Power $0.01960 per kWh 5%/Yr Expenses	Revenue less Expenses & Investment	6% Present Worth Factor	Present Worth of each Year	Sum of Present Worth of all previous Years	Rolling Internal Rate of Return	Year	Growth Factor for Expenses %	2.00% 2000 Factor for Customers %
2,004	0	0	0	0	0		$ 2,156,000	0	$ (2,156,000)	1.0000	$ (2,156,000)	$ (2,156,000)		0		
2,005	1	40	40	500	$113,699	$ 85,440	$ -	$2,791	$ 25,469	0.9434	$ 24,027	$ (2,131,973)	#NUM!	1	5.00%	2.00%
2,006	2	80	120	540	$122,795	$ 170,880	$ -	$6,028	$ (54,113)	0.8900	$ (48,160)	$ (2,180,133)	#NUM!	2	10.00%	4.00%
2,007	3	120	240	1,080	$245,590	$ 256,320	$ -	$18,083	$ (28,813)	0.8396	$ (24,192)	$ (2,204,325)	#NUM!	3	15.00%	6.00%
2,008	4	160	400	1,800	$409,317	$ 341,760	$ -	$40,184	$ 27,373	0.7921	$ 21,682	$ (2,182,643)	#NUM!	4	20.00%	8.00%
2,009	5	200	600	2,700	$613,975	$ 427,200	$ -	$75,345	$ 111,430	0.7473	$ 83,267	$ (2,099,376)	#NUM!	5	25.00%	10.00%
2,010	6	240	840	3,780	$859,565	$ 512,640	$ -	$126,580	$ 220,345	0.7050	$ 155,335	$ (1,944,041)	#NUM!	6	30.00%	12.00%
2,011	7	280	1,120	5,040	$1,203,392	$ 598,080	$ -	$196,903	$ 408,409	0.6651	$ 271,615	$ (1,672,426)	#NUM!	7	35.00%	14.00%
2,012	8	320	1,440	6,480	$1,547,218	$ 683,520	$ -	$289,326	$ 574,372	0.6274	$ 360,368	$ (1,312,058)	#NUM!	8	40.00%	16.00%
2,013	9	360	1,800	8,100	$1,934,022	$ 768,960	$ -	$406,865	$ 758,197	0.5919	$ 448,776	$ (863,282)	#NUM!	9	45.00%	18.00%
2,014	10	400	2,200	9,900	$2,363,805	$ 854,400	$ -	$552,533	$ 956,872	0.5584	$ 534,313	$ (328,970)	#DIV/0!	10	50.00%	20.00%
2,015	11	440	2,640	11,880	$2,836,566	$ 939,840	$ -	$729,343	$ 1,167,383	0.5268	$ 614,963	$ 285,993	#DIV/0!	11	55.00%	22.00%
2,016	12	480	3,120	14,040	$3,352,305	$ 1,025,280	$ -	$940,310	$ 1,386,715	0.4970	$ 689,155	$ 975,148	#DIV/0!	12	60.00%	24.00%
2,017	13	520	3,640	16,380	$3,911,023	$ 1,110,720	$ -	$1,188,447	$ 1,611,855	0.4688	$ 755,701	$ 1,730,848	#DIV/0!	13	65.00%	26.00%
2,018	14	560	4,200	18,900	$4,738,354	$ 1,196,160	$ -	$1,476,769	$ 2,065,425	0.4423	$ 913,540	$ 2,644,388	#DIV/0!	14	70.00%	28.00%
2,019	15	600	4,800	21,600	$5,415,262	$ 1,281,600	$ 2,500,000	$1,808,289	$ (174,626)	0.4173	$ (72,865)	$ 2,571,523	#DIV/0!	15	75.00%	30.00%
2,020	16	640	5,440	24,480	$6,137,297	$ 1,367,040	$ -	$2,186,020	$ 2,584,237	0.3936	$ 1,017,275	$ 3,588,798	#DIV/0!	16	80.00%	32.00%
2,021	17	680	6,120	27,540	$6,904,459	$ 1,452,480	$ -	$2,612,977	$ 2,839,002	0.3714	$ 1,054,304	$ 4,643,103	#NUM!	17	85.00%	34.00%
2,022	18	720	6,840	30,780	$7,716,749	$ 1,537,920	$ -	$3,092,173	$ 3,086,655	0.3503	$ 1,081,390	$ 5,724,493	1%	18	90.00%	36.00%
2,023	19	760	7,600	34,200	$8,574,165	$ 1,623,360	$ -	$3,626,623	$ 3,324,182	0.3305	$ 1,098,685	$ 6,823,178	3%	19	95.00%	38.00%
2,024	20	800	8,400	37,800	$9,476,709	$ 1,708,800	$ -	$4,219,340	$ 3,548,569	0.3118	$ 1,106,461	$ 7,929,639	5%	20	100.00%	40.00%
2,025	21	840	9,240	41,580	$10,424,380	$ 1,794,240	$ -	$4,641,274	$ 3,988,866	0.2942	$ 1,173,346	$ 9,102,985	6%	21	100.00%	42.00%
2,026	22	880	10,120	45,540	$11,988,037	$ 1,879,680	$ -	$5,083,300	$ 5,025,057	0.2775	$ 1,394,479	$ 10,497,464	8%	22	100.00%	44.00%
2,027	23	920	11,040	49,680	$13,077,858	$ 1,965,120	$ 3,500,000	$5,545,418	$ 2,067,320	0.2618	$ 541,219	$ 11,038,683	9%	23	100.00%	46.00%
2,028	24	960	12,000	54,000	$14,215,063	$ 2,050,560	$ -	$6,027,629	$ 6,136,875	0.2470	$ 1,515,676	$ 12,554,359	9%	24	100.00%	48.00%
2,029	25	1,000	13,000	58,500	$15,399,652	$ 2,136,000	$ -	$6,529,931	$ 6,733,721	0.2330	$ 1,568,948	$ 14,123,307	10%	25	100.00%	50.00%
2,030	26	1,040	14,040	63,180	$16,631,624	$ 2,221,440	$ -	$7,052,325	$ 7,357,859	0.2198	$ 1,617,331	$ 15,740,638	11%	26	100.00%	52.00%
2,031	27	1,080	15,120	68,040	$17,910,980	$ 2,306,880	$ -	$7,594,812	$ 8,009,288	0.2074	$ 1,660,870	$ 17,401,508	11%	27	100.00%	54.00%
2,032	28	1,120	16,240	73,080	$19,237,719	$ 2,392,320	$ -	$8,157,391	$ 8,688,008	0.1956	$ 1,699,636	$ 19,101,144	12%	28	100.00%	56.00%
2,033	29	1,160	17,400	78,300	$20,611,842	$ 2,477,760	$ -	$8,740,061	$ 9,394,020	0.1846	$ 1,733,730	$ 20,834,874	12%	29	100.00%	58.00%
2,034	30	1,200	18,600	83,700	$22,033,348	$ 2,563,200	$ -	$9,342,824	$ 10,127,324	0.1741	$ 1,763,270	$ 22,598,144	12%	30	100.00%	60.00%
		18,600		893,120	$ 230,006,771	$ 39,729,600	$ -	$ 92,309,894								

Plant		
	Electric Plant	Dollars
Distribution		**$77,377,252**
General Plant		**$7,320,433**
Transmission		**$1,721,651**
Other Plant		**$8,525**
	Total	**$86,427,861**

EXHIBIT E

Willow Spring Financial Calculations Based on Medium Growth

Cost of Services, Based on Test Year December 31, 2000

RECONCILIATION OF EXPENSES IN YEAR 2000 COST STUDY	31-Dec-00 Audit report	Total kWh 396,502,342	Date	Year	New Customers per Year	4.5 kW per home Load, kW Total Customers	W/ Load Factor 65%	Revenue less cost of Power plus 5% $0.03994 per kWh Revenue	$2,136 per customer Distribution Investment	Substation and Transmission Investment	Total O & M less Cost of Power $0.01960 per kWh 5%/Yr Expenses	Revenue less Expenses & Investment	6% Present Worth Factor	Present Worth of each Year	Sum of Present Worth of all previous Years	Rolling Internal Rate of Return	Year	Growth Factor for Expenses %	5.00% 2000 Factor for Customers %
			2,004	0	0	0	0	0		$ 2,156,000	0	$ (2,156,000)	1.0000	$ (2,156,000)	$ (2,156,000)		0		
Total Electric Plant	$ 90,344,818	$/kWh	2,005	1	100	100	500	$113,699	$ 213,600	$ -	$2,791	$ (102,691)	0.9434	$ (96,879)	$ (2,252,879)	#NUM!	1	5.00%	5.00%
Total Sales of Electric Energy	$ 36,533,674	$0.09214	2,006	2	200	300	1,350	$306,988	$ 427,200	$ -	$15,069	$ (135,281)	0.8900	$ (120,400)	$ (2,373,279)	#NUM!	2	10.00%	10.00%
Other Electric Revenue	$ 727,276	$0.00183	2,007	3	300	600	2,700	$613,975	$ 640,800	$ -	$45,207	$ (72,032)	0.8396	$ (60,479)	$ (2,433,758)	#NUM!	3	15.00%	15.00%
Total Operating Revenue	**$ 37,260,950**	$0.09397	2,008	4	400	1,000	4,500	$1,023,292	$ 854,400	$ -	$100,460	$ 68,432	0.7921	$ 54,204	$ (2,379,554)	#NUM!	4	20.00%	20.00%
Revenue less cost of Power	**$15,080,861**	$0.03803	2,009	5	500	1,500	6,750	$1,534,938	$ 1,068,000	$ -	$188,363	$ 278,575	0.7473	$ 208,167	$ (2,171,386)	#NUM!	5	25.00%	25.00%
Power Production Expense	$ -		2,010	6	600	2,100	9,450	$2,148,914	$ 1,281,600	$ -	$316,450	$ 550,863	0.7050	$ 388,337	$ (1,783,050)	#NUM!	6	30.00%	30.00%
Cost of Purchased Power	**$ 22,180,089**	$0.05594	2,011	7	700	2,800	12,600	$3,008,479	$ 1,495,200	$ -	$492,256	$ 1,021,023	0.6651	$ 679,038	$ (1,104,011)	#NUM!	7	35.00%	35.00%
Transmission Expense	$ 22,683	$0.00006	2,012	8	800	3,600	16,200	$3,868,044	$ 1,708,800	$ -	$723,315	$ 1,435,929	0.6274	$ 900,920	$ (203,092)	#NUM!	8	40.00%	40.00%
Distribution Expense - Operation	$ 2,983,874	$0.00753	2,013	9	900	4,500	20,250	$4,835,056	$ 1,922,400	$ 2,500,000	$1,017,162	$ (604,507)	0.5919	$ (357,807)	$ (560,898)	#NUM!	9	45.00%	45.00%
Distribution Expense - Maintenance	$ 1,039,138	$0.00262	2,014	10	1,000	5,500	24,750	$5,909,512	$ 2,136,000	$ -	$1,381,332	$ 2,392,181	0.5584	$ 1,335,781	$ 774,883	#DIV/0!	10	50.00%	50.00%
Consumer Accounts Expense	$ 1,348,993	$0.00340	2,015	11	1,100	6,600	29,700	$7,091,415	$ 2,349,600	$ -	$1,823,358	$ 2,918,457	0.5268	$ 1,537,407	$ 2,312,290	#DIV/0!	11	55.00%	55.00%
Customer Service and Informational Expense	$ 195,134	$0.00049	2,016	12	1,200	7,800	35,100	$8,380,763	$ 2,563,200	$ -	$2,350,775	$ 3,466,788	0.4970	$ 1,722,887	$ 4,035,177	#DIV/0!	12	60.00%	60.00%
Sales	$ 226,032	$0.00057	2,017	13	1,300	9,100	40,950	$9,777,557	$ 2,776,800	$ -	$2,971,119	$ 4,029,638	0.4688	$ 1,889,252	$ 5,924,429	#NUM!	13	65.00%	65.00%
Administrative and General	$ 1,957,009	$0.00494	2,018	14	1,400	10,500	47,250	$11,845,886	$ 2,990,400	$ 3,500,000	$3,691,922	$ 1,663,564	0.4423	$ 735,796	$ 6,660,225	1%	14	70.00%	70.00%
Total Operation and Maintenance Expense	**$ 29,952,952**	$0.07554	2,019	15	1,500	12,000	54,000	$13,538,156	$ 3,204,000		$4,520,721	$ 5,813,434	0.4173	$ 2,425,743	$ 9,085,968	5%	15	75.00%	75.00%
Total O & M less Cost of Power	**$ 7,772,863**	$0.01960	2,020	16	1,600	13,600	61,200	$15,343,243	$ 3,417,600	$ -	$5,465,050	$ 6,460,593	0.3936	$ 2,543,188	$ 11,629,156	8%	16	80.00%	80.00%
Depreciation and Amortization	$ 2,515,103	$0.00634	2,021	17	1,700	15,300	68,850	$17,261,148	$ 3,631,200	$ -	$6,532,442	$ 7,097,506	0.3714	$ 2,635,761	$ 14,264,917	10%	17	85.00%	85.00%
Tax Expense - Property and Gross Receipts	$ -	$0.00000	2,022	18	1,800	17,100	76,950	$19,291,872	$ 3,844,800	$ -	$7,730,434	$ 7,716,638	0.3503	$ 2,703,476	$ 16,968,394	12%	18	90.00%	90.00%
Property Tax less G. Receipts	$ 286	$0.00000	2,023	19	1,900	19,000	85,500	$21,435,413	$ 4,058,400	$ -	$9,066,558	$ 8,310,455	0.3305	$ 2,746,714	$ 19,715,107	14%	19	95.00%	95.00%
Tax Expense - Other			2,024	20	2,000	21,000	94,500	$23,691,772	$ 4,272,000	$ 3,500,000	$10,548,350	$ 5,371,422	0.3118	$ 1,674,835	$ 21,389,942	15%	20	100.00%	100.00%
Interest on Long Term Debt	$ 2,370,185	$0.00598	2,025	21	2,100	23,100	103,950	$26,060,949	$ 4,485,600	$ -	$11,603,185	$ 9,972,165	0.2942	$ 2,933,366	$ 24,323,308	16%	21	100.00%	105.00%
Interest Charged to Construction Credit			2,026	22	2,200	25,300	113,850	$29,970,092	$ 4,699,200	$ -	$12,708,250	$ 12,562,642	0.2775	$ 3,486,197	$ 27,809,505	16%	22	100.00%	110.00%
Interest Expense - Other	$ 48,600	$0.00012	2,027	23	2,300	27,600	124,200	$32,694,646	$ 4,912,800	$ -	$13,863,546	$ 13,918,300	0.2618	$ 3,643,773	$ 31,453,278	17%	23	100.00%	115.00%
Other Deductions	$ 71,439	$0.00018	2,028	24	2,400	30,000	135,000	$35,537,658	$ 5,126,400	$ -	$15,069,071	$ 15,342,187	0.2470	$ 3,789,191	$ 35,242,469	18%	24	100.00%	120.00%
Total Cost of Electric Service	**$ 34,958,565**	$0.08817	2,029	25	2,500	32,500	146,250	$38,499,130	$ 5,340,000	$ 3,500,000	$16,324,827	$ 13,334,303	0.2330	$ 3,106,874	$ 38,349,343	18%	25	100.00%	125.00%
Cost of Service less Cost of Power	**$12,778,476**	$0.03223	2,030	26	2,600	35,100	157,950	$41,579,060	$ 5,553,600	$ -	$17,630,813	$ 18,394,647	0.2198	$ 4,043,328	$ 42,392,671	19%	26	100.00%	130.00%
Operating Margins	$ 2,302,385	$0.00581	2,031	27	2,700	37,800	170,100	$44,777,450	$ 5,767,200	$ -	$18,987,030	$ 20,023,220	0.2074	$ 4,152,174	$ 46,544,845	19%	27	100.00%	135.00%
			2,032	28	2,800	40,600	182,700	$48,094,298	$ 5,980,800	$ -	$20,393,476	$ 21,720,021	0.1956	$ 4,249,091	$ 50,793,936	19%	28	100.00%	140.00%
Non Operating Margins - Interest	$ 156,376	$0.00039	2,033	29	2,900	43,500	195,750	$51,529,605	$ 6,194,400	$ 3,500,000	$21,850,153	$ 19,985,051	0.1846	$ 3,688,376	$ 54,482,312	19%	29	100.00%	145.00%
Other Capital Credits	$ 88,808	$0.00022	2,034	30	3,000	46,500	209,250	$55,083,370	$ 6,408,000	$ -	$23,357,061	$ 25,318,310	0.1741	$ 4,408,174	$ 58,890,486	20%	30	100.00%	150.00%
Net Margins	**$ 2,547,569**	$0.00643			46,500		2,232,050	$ 574,846,380	$ 99,324,000	$ -	$ 230,770,548								

Plant		
	Electric Plant	Dollars
Distribution		**$77,377,252**
General Plant		**$7,320,433**
Transmission		**$1,721,651**
Other Plant		**$8,525**
	Total	**$86,427,861**

Willow Spring Financial Calculations Based on High Growth

Cost of Services, Based on Test Year December 31, 2000

RECONCILIATION OF EXPENSES IN YEAR 2000 COST STUDY	31-Dec-00 Audit report	Total kWh 396,502,342	Date	Year	New Customers per Year	Total Customers	4.5 kW per home Load, kW W/ Load Factor 65%	Revenue less cost of Power plus 5% $0.03994 per kWh Revenue	$2,136 per customer Distribution Investment	Substation and Transmission Investment	Total O & M less Cost of Power $0.01960 per kWh 5%/Yr Expenses	Revenue less Expenses & Investment	6% Present Worth Factor	Present Worth of each Year	Sum of Present Worth of all previous Years	Rolling Internal Rate of Return	Year	Growth Factor for Expenses %	10.00% 2000 Factor for Customers %
			2,004	0	0	0	0	0		$ 2,156,000	0	$ (2,156,000)	1.0000	$ (2,156,000)	$ (2,156,000)		0		
Total Electric Plant	$ 90,344,818	$/kWh	2,005	1	200	200	500	$113,699	$ 427,200	$ -	$2,791	$ (316,291)	0.9434	$ (298,388)	$ (2,454,388)	#NUM!	1	5.00%	10.00%
Total Sales of Electric Energy	$ 36,533,674	$0.09214	2,006	2	400	600	2,700	$613,975	$ 854,400	$ -	$30,138	$ (270,563)	0.8900	$ (240,800)	$ (2,695,188)	#NUM!	2	10.00%	20.00%
Other Electric Revenue	$ 727,276	$0.00183	2,007	3	600	1,200	5,400	$1,227,951	$ 1,281,600	$ -	$90,414	$ (144,064)	0.8396	$ (120,959)	$ (2,816,147)	#NUM!	3	15.00%	30.00%
Total Operating Revenue	**$ 37,260,950**	$0.09397	2,008	4	800	2,000	9,000	$2,046,584	$ 1,708,800	$ -	$200,921	$ 136,863	0.7921	$ 108,409	$ (2,707,738)	#NUM!	4	20.00%	40.00%
Revenue less cost of Power	**$15,080,861**	$0.03803	2,009	5	1,000	3,000	13,500	$3,069,877	$ 2,136,000	$ -	$376,727	$ 557,150	0.7473	$ 416,335	$ (2,291,404)	#NUM!	5	25.00%	50.00%
Power Production Expense	$ -		2,010	6	1,200	4,200	18,900	$4,297,827	$ 2,563,200	$ 2,500,000	$632,901	$ (1,398,274)	0.7050	$ (985,728)	$ (3,277,131)	#NUM!	6	30.00%	60.00%
Cost of Purchased Power	**$ 22,180,089**	$0.05594	2,011	7	1,400	5,600	25,200	$6,016,958	$ 2,990,400	$ -	$984,513	$ 2,042,045	0.6651	$ 1,358,077	$ (1,919,055)	#NUM!	7	35.00%	70.00%
Transmission Expense	$ 22,683	$0.00006	2,012	8	1,600	7,200	32,400	$7,736,089	$ 3,417,600	$ -	$1,446,631	$ 2,871,858	0.6274	$ 1,801,839	$ (117,215)	#NUM!	8	40.00%	80.00%
Distribution Expense - Operation	$ 2,983,874	$0.00753	2,013	9	1,800	9,000	40,500	$9,670,111	$ 3,844,800	$ -	$2,034,325	$ 3,790,986	0.5919	$ 2,243,879	$ 2,126,664	#NUM!	9	45.00%	90.00%
Distribution Expense - Maintenance	$ 1,039,138	$0.00262	2,014	10	2,000	11,000	49,500	$11,819,025	$ 4,272,000	$ 3,500,000	$2,762,663	$ 1,284,362	0.5584	$ 717,181	$ 2,843,845	#DIV/0!	10	50.00%	100.00%
Consumer Accounts Expense	$ 1,348,993	$0.00340	2,015	11	2,200	13,200	59,400	$14,182,830	$ 4,699,200	$ -	$3,646,715	$ 5,836,914	0.5268	$ 3,074,814	$ 5,918,658	#DIV/0!	11	55.00%	110.00%
Customer Service and Informational Expense	$ 195,134	$0.00049	2,016	12	2,400	15,600	70,200	$16,761,526	$ 5,126,400	$ -	$4,701,550	$ 6,933,576	0.4970	$ 3,445,775	$ 9,364,433	0%	12	60.00%	120.00%
Sales	$ 226,032	$0.00057	2,017	13	2,600	18,200	81,900	$19,555,114	$ 5,553,600	$ -	$5,942,237	$ 8,059,276	0.4688	$ 3,778,503	$ 13,142,936	6%	13	65.00%	130.00%
Administrative and General	$ 1,957,009	$0.00494	2,018	14	2,800	21,000	94,500	$23,691,772	$ 5,980,800	$ 3,500,000	$7,383,845	$ 6,827,127	0.4423	$ 3,019,645	$ 16,162,581	10%	14	70.00%	140.00%
Total Operation and Maintenance Expense	**$ 29,952,952**	$0.07554	2,019	15	3,000	24,000	108,000	$27,076,311	$ 6,408,000	$ -	$9,041,443	$ 11,626,868	0.4173	$ 4,851,486	$ 21,014,067	13%	15	75.00%	150.00%
Total O & M less Cost of Power	**$ 7,772,863**	$0.01960	2,020	16	3,200	27,200	122,400	$30,686,486	$ 6,835,200	$ -	$10,930,100	$ 12,921,186	0.3936	$ 5,086,377	$ 26,100,444	16%	16	80.00%	160.00%
Depreciation and Amortization	$ 2,515,103	$0.00634	2,021	17	3,400	30,600	137,700	$34,522,297	$ 7,262,400	$ -	$13,064,885	$ 14,195,012	0.3714	$ 5,271,522	$ 31,371,966	18%	17	85.00%	170.00%
Tax Expense - Property and Gross Receipts	$ -	$0.00000	2,022	18	3,600	34,200	153,900	$38,583,743	$ 7,689,600	$ 3,500,000	$15,460,867	$ 11,933,276	0.3503	$ 4,180,749	$ 35,552,716	19%	18	90.00%	180.00%
Property Tax less G. Receipts	$ 286	$0.00000	2,023	19	3,800	38,000	171,000	$42,870,826	$ 8,116,800	$ -	$18,133,116	$ 16,620,910	0.3305	$ 5,493,427	$ 41,046,143	20%	19	95.00%	190.00%
Tax Expense - Other			2,024	20	4,000	42,000	189,000	$47,383,544	$ 8,544,000	$ -	$21,096,700	$ 17,742,845	0.3118	$ 5,532,303	$ 46,578,446	21%	20	100.00%	200.00%
Interest on Long Term Debt	$ 2,370,185	$0.00598	2,025	21	4,200	46,200	207,900	$52,121,899	$ 8,971,200	$ 3,500,000	$23,206,370	$ 16,444,329	0.2942	$ 4,837,188	$ 51,415,634	22%	21	100.00%	210.00%
Interest Charged to Construction Credit			2,026	22	4,400	50,600	227,700	$59,940,184	$ 9,398,400	$ -	$25,416,500	$ 25,125,283	0.2775	$ 6,972,394	$ 58,388,028	23%	22	100.00%	220.00%
Interest Expense - Other	$ 48,600	$0.00012	2,027	23	4,600	55,200	248,400	$65,389,291	$ 9,825,600	$ 3,500,000	$27,727,091	$ 24,336,600	0.2618	$ 6,371,255	$ 64,759,283	23%	23	100.00%	230.00%
Other Deductions	$ 71,439	$0.00018	2,028	24	4,800	60,000	270,000	$71,075,317	$ 10,252,800	$ -	$30,138,143	$ 30,684,374	0.2470	$ 7,578,382	$ 72,337,665	23%	24	100.00%	240.00%
Total Cost of Electric Service	**$ 34,958,565**	$0.08817	2,029	25	5,000	65,000	292,500	$76,998,260	$ 10,680,000	$ -	$32,649,654	$ 33,668,605	0.2330	$ 7,844,739	$ 80,182,404	24%	25	100.00%	250.00%
Cost of Service less Cost of Power	**$12,778,476**	$0.03223	2,030	26	5,200	70,200	315,900	$83,158,121	$ 11,107,200	$ 3,500,000	$35,261,627	$ 33,289,294	0.2198	$ 7,317,321	$ 87,499,725	24%	26	100.00%	260.00%
Operating Margins	$ 2,302,385	$0.00581	2,031	27	5,400	75,600	340,200	$89,554,899	$ 11,534,400	$ -	$37,974,060	$ 40,046,439	0.2074	$ 8,304,348	$ 95,804,073	24%	27	100.00%	270.00%
			2,032	28	5,600	81,200	365,400	$96,188,595	$ 11,961,600	$ 3,500,000	$40,786,953	$ 39,940,042	0.1956	$ 7,813,476	$ 103,617,549	24%	28	100.00%	280.00%
Non Operating Margins - Interest	$ 156,376	$0.00039	2,033	29	5,800	87,000	391,500	$103,059,209	$ 12,388,800	$ 3,500,000	$43,700,307	$ 43,470,102	0.1846	$ 8,022,700	$ 111,640,250	25%	29	100.00%	290.00%
Other Capital Credits	$ 88,808	$0.00022	2,034	30	6,000	93,000	418,500	$110,166,741	$ 12,816,000	$ -	$46,714,121	$ 50,636,620	0.1741	$ 8,816,349	$ 120,456,598	25%	30	100.00%	300.00%
Net Margins	$ 2,547,569	$0.00643			93,000		4,463,600	$ 1,149,579,060	$ 198,648,000	$ 32,656,000	$ 461,538,306								

Plant	
Electric Plant	Dollars
Distribution	**$77,377,252**
General Plant	**$7,320,433**
Transmission	**$1,721,651**
Other Plant	**$8,525**
Total	**$86,427,861**

EXHIBIT F

REPLY TO ACC LETTER, DATED SEPTEMBER 14, 2004

RE: TRICO ELECTRIC COOPERATIVE, INC. – APPLILCATION FOR AN EXTENSION OF ITS CERTIFICATE OF CONVENIENCE AND NECESSITY (DOCKET NO. E-01461A-04-0393) – INSUFFIENCY LETTER

ITEM 8 – Please provide a description of the right of way process for the proposed transmission line. Please include a timeline, the estimated cost and method of finance.

RIGHT OF WAY PROCESS
The 69 KV right-of-way and substation site will be center lined and staked. Once the right-of-way has been center lined, the environmental process will begin. Once the environmental studies have been completed, an Application for Right-of-Way will be filed with the Arizona State Land Department.

TIME LINE
The right-of-way process will take approximately 1 year to 1 1/2 year.

ESTIMATED COST
The estimated cost $613,100 (State Land Right-of-Way for 69KV transmission line = $204,000 Substation Site = $17,500, Staking and Design = $351,600 Environmental = $40,000 Total cost = $613,100)

METHOD OF FINANCE
Trico is funded by Rural Utility Services (RUS)

EXHIBIT G

SOUTHWEST TRANSMISSION COOPERATIVE'S TRANSMISSION SERVICE PLANS FOR TRICO SOUTHERN PINAL COUNTY LOADS

September 28, 2004

Southwest Transmission Cooperative, Inc. (SWTC) and Trico Electric Cooperative, Inc. (Trico) through joint planning have established a need to provide a new substation in the Oracle Area of South Pinal County, called Saddlebrooke Ranch. The need for the Saddlebrooke Ranch Substation is driven by anticipated load growth in the certificated service area of Trico in Southern Pinal County. The Saddlebrooke Ranch Project has been included in the SWTC 2003-2012 and 2004-2013 Ten Year Plan Filings to the Arizona Corporation Commission ("Commission"), which were submitted in January 2003 and January 2004 respectively. As reflected in the SWTC Ten Year Plan Filings, the Saddlebrooke Ranch Substation is planned to interconnect to the Arizona Public Service Company (APS) San Manuel to Oracle 115 kV line, and is expected to include a 50 MVA, 115/24.9 kV transformer.

The SWTC 2003-2012 Ten Year Plan Filing with the Commission included a plan to serve the Willow Springs Area with a 9.5 mile 115 kV line out of the Saddlebrooke Ranch Substation, which had an estimated in-service date of February 2011. Since the filing of SWTC's 2003-2012 Ten Year Plan with the Commission, Trico has had subsequent discussions with the developer at Willow Springs indicating a need for service in late 2005, much earlier than 2011. To accommodate this accelerated service schedule, SWTC and Trico now plan to serve the Willow Springs load with a 24.9 kV distribution line out of Saddlebrooke Ranch Substation with a possible future tie to a planned 69 kV subsystem.

Consequently, the Saddlebrooke Ranch to Willow Springs 115 kV Line Project was not included in the SWTC 2004-2013 Ten Year Plan Filing with the Commission. Instead, Trico has asked SWTC to consider, as part of their request to APS to provide an interconnection for Saddlebrooke Ranch Substation by December of 2005 which is one year earlier than the expected in service date of December 2006.

APS and SWTC held an initial scoping meeting regarding the Saddlebrooke Ranch interconnection on August 20, 2004. Two alternatives were discussed for providing service to the Willow Springs load by December 2005 (i) use Trico's mobile substation, tapped directly off of the APS 115 kV line, to provide a temporary distribution circuit to Willow Springs which would be tied into the Saddlebrooke Ranch Substation when it is completed in December 2006; or (ii) construct the Saddlebrooke Ranch Substation by December 2005, to allow Trico to serve Willow Springs with a permanent distribution circuit immediately. APS has indicated to SWTC that they expect their 115 kV transmission system to be adequate to serve the load expected by Trico in Southern Pinal County.

EXHIBIT H

ITEM 10 - "Please explain how Trico would ensure reliability of service with one radial 69 kW feed to serve the proposed extension area."

While the project will initially be served by a 69 kV radial transmission installation, Trico's long range plan includes installing a loop system for the development. It is Trico's system planning philosophy to loop substations with transmission facilities or strong distribution feeders.

1.) Trico has a similar 69 kV radial system that feeds the Robson Community of Saddlebrooke. This system has been in place since 1990 and continues to perform at excellent reliability levels.

2.) The Saddlebrooke area's standard power reliability statistic indices are the best in comparison to other portions of Trico's distribution system. They are as follows:

CAIDI = 190.78
SAIDI = .0319
SAIFI = .0136

Exhibit I is a graph comparing each of Trico's substations by average outage hours per customer for 2003.

Definitions of indices:
CAIDI - Customer Average Interruption Duration Index is the average interruption duration in minutes per customer for the month/year to date computed as the ratio of the customer hours of interruption time divided by the total number of interruptions.
SAIDI - System Average Interruption Duration Index is the measure of duration of the average interruption for each customer, computed as the ratio of the total customer hours of interruption time divided by the total number of customer served.
SAIFI - System Average Interruption Frequency Index is the average number of times that a customer is interrupted during the year, computed as the ratio of the total number of interruptions divided by the total number of customers served.

3.) Trico will construct the 69 kV radial feed as Grade B Construction per National Electric Safety Code requirements. Grade B is a higher grade of construction, recognizing that reliability is of utmost importance.

4.) Trico will secure a permanent access road to the 69 kV line, for unproblematic access.

5.) The line will be monitored by Trico's Supervisory Control and Data Acquisition system 24 hours/7 days per week.

6.) Trico employs a 24 X 7 dispatch center locally to respond to member needs.

7.) In 2005, Trico plans to enhance our Automated Outage System for efficient outage management.

8.) Trico will populate the development with Automated Meter Reading. This system aids in the diagnostics of specific trouble.

9.) Trico will install premium Isolation/Sectionalizing Equipment.

10.) Trico will install premium underground cable (345 ml insulation).

11.) Trico will install fusing devices throughout the underground distribution system.

12.) Trico has an assured power supply with the "All Requirements Contract" with Arizona Electric Power Cooperative.

Exhibit I
Average Outage Hours per Customers for 2003